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From: Laidlaw, Tina
Sent: Wed 5/29/2013 4:50:52 PM
Subject: A few follow-up questions/ comments

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Dave,

I wanted to touch base with you to make sure I've got the number correct for the various interim limits. When I looked at my meeting notes, I think you said that the permits would be 1 mg/L TP; 10 mg/L TN until 2016; next permit cycle would be 0.08 mg/L TP and 8 mg/L TN; and last permit cycle would be 0.06 mg/L and 6 mg/L TN. Are those the correct numbers? Part of the reason why I'm asking is that the TP numbers are much higher than the ones proposed in the original memo (i.e., 0.6 mg/L TP compared to 0.1 mg/L). Is the League open to lowering the TP limits to 0.1 mg/L for the second permit cycle? Lower TP numbers would be helpful as I share this concept with HQs folks. Just a thought.

Also, I think there was a question about whether individual variances would still be available to facilities >1MGD if the interim limits were identified in the rule package. From EPA's perspective, individual variances are still an option if a facility can demonstrate that they cannot achieve the proposed interim limits for reasons identified in the flow chart / draft rules (e.g., economics, focus on one nutrient, etc.). Hopefully that lends support to the League's approach to defining the interim limits in rule since there is still flexibility to pursue individual variances if needed.

Look forward to hearing from you.

Tina